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June 9, 2015

Mrs. Mary Yeargan, P.G.
Southwest District Director
Florida Department of Environmental Protection
13051 N Telecom Parkway
Temple Terrace, FL 33637-0926

Re: City of Largo Administrative Order Update
Permit No. FL0026603

This midyear update to Administrative Order (AO) No. AO-152-SW covers the period between November 1, 2014 and April 2015, and addresses the City of Largo's requirements to (1) begin a study of the necessary actions needed to meet its Total Nitrogen load allocation; and (2) to provide the Florida Department of Environmental Protection Southwest District with semi-annual reports outlining progress toward compliance within the time frames specified.

Table I below depicts the wastewater treatment facility's Nitrogen Load for the reporting period.

Table 1 – City of Largo's WWTF Nitrogen Load Summary					
Year	Month	Monthly Total Flow (million gals/mo)	Monthly Average Total Nitrogen Concentration (mg/L)		Total Nitrogen Load (tons)
2014	November	146.5	2.67		1.63
2014	December	176.1	2.42		1.78
2015	January	198.7	2.69		2.23
2015	February	241.7	2.90		2.92
2015	March	221.6	2.59		2.39
2015	April	164.3	2.56		1.75
2015	May	-	-		-
2015	June	-	-		-
2015	July	-	-		-
2015	August	-	-		-
2015	September	-	-		-
2015	October	-	-		-
Nov 2014 – Apr 2015		1,148.9	2.64	Annual avg.	12.7

At last report, RESCO, Pinellas County's waste-to-energy facility, was experiencing difficulty in using its own water treatment plant and pond system to provide cooling water. As a result, RESCO's demand for reclaimed water from the City of Largo was at historic high usage levels. As **Attachment I** shows, RESCO's demand has now fallen to anticipated levels of between 250-300 thousand gallons per day, supporting the fact that they are actively using their own facilities for cooling water. Consequently, the City's wastewater reclamation facility's mid year total flow to surface water and total Nitrogen load are above comparable levels in the previous period. Additionally, the combination of seasonal rains and reduced RESCO takeaway suggest that this trend will continue.

With respect to managing future Nitrogen loading, the City continues to pursue the following options to meet the requirements:

- Continued participation in the Tampa Bay Nitrogen Management Consortium
- A regional interconnection to transport reclaimed water to a Pasco County reservoir
- Investigate options to expand reclaimed water system for commercial users
- Permanently increased the number of residential watering days from 2 to 3
- Explore local interconnection opportunity between the Largo, Clearwater and Pinellas County

Continued participation in the Tampa Bay Nitrogen Management Consortium

City of Largo staff have attended quarterly meetings of the Tampa Bay Nitrogen Management Consortium. The City has met its financial requirements for participating in and supporting the Consortium's efforts in maintaining the health of Tampa Bay through establishing a Total Maximum Daily Load (TMDL) allocation strategy to help meet current needs and future growth in the region.

Possible regional interconnection opportunity (Pipeline to Pasco) funded by RESTORE Act of 2012

The City of Largo has participated in activities associated with Pasco County Utilities' application for grant funding through the RESTORE Act of 2012. If awarded, this grant would minimize surface water discharge from water reclamation facilities, maximize the beneficial use of RCW, capture stormwater for augmenting RCW supplies, assist with alleviating flooding conditions, and improve the sustainability of the water supplies and wetlands. These activities have not progressed beyond the last report on this item.

Evaluating a reclaimed water system expansion for commercial users

The City of Largo's Engineering division is completing scope definition for an evaluation of the City's reclaimed water system, and the potential for expansion to connect a significant number commercial users. The project has been delayed by continued staff turnover and the start of several large Consent Order related construction projects.

Developing options for increasing reuse consumption by existing (and potential) commercial and residential customers

The Environmental Services department has formed a team to develop targeted communications for eligible households and commercial entities, highlighting the benefits of reuse. Team meetings are being coordinated and facilitated by the department's Coordinator of Special Projects.

Increasing the number of residential watering days

The City's trial program which increased the number of watering days for residential customers is being recommended as a permanent change to the ordinance. This change, along with a number of others within this section of the ordinance, will be presented to the City's Commission during the early fall.

Possible local interconnection opportunity between the Largo, Clearwater and Pinellas County

Discussions with the City of Clearwater and Pinellas County to identify and develop the potential for local interconnection opportunities have stalled.

In summary, the City of Largo has continued to pursue the goals of AO-152-SW, and has made some positive headway. If you have any questions regarding the information contained within this report, or would like to discuss any element in detail, please contact me at (727) 518-3061.

Vivian L. Gleaves
Environmental Manager
City of Largo

cc: I. Kety, Director Environmental Services, Largo
M. Staffopoulos, Assistant City Manager, Largo

Attachment I		
RESCO's Reclaimed Water Consumption		
Year	Month	Consumption (in gallons)
2014	November	18,900,300
2014	December	18,900,300
2015	January	7,447,000
2015	February	7,447,000
2015	March	7,537,000
2015	April	7,537,000
2015	May	-0-
2015	June	-0-
2015	July	-0-
2015	August	-0-
2015	September	-0-
2015	October	-0-
	Total Nov. 2014 – May 2015	67,774,000
	Total Nov. 2013 – May 2014	95,773,000